

**REMARKS/ARGUMENTS**

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. By this Amendment, claims 9 and 10 have been cancelled and claims 11-21 have been added. Claims 11-21 are pending for further examination. Applicant believes the new claims to be distinguishable from the prior art of record for at least the following reasons.

Claims 9 and 10 were rejected under 35 U.S.C. §103 as being unpatentable over Sampat et al. (U.S. Pat. 5,557,724 "Sampat") in view of Knowles (U.S. Pat. 5,481,509 "Knowles"). Applicant, however, has cancelled claims 9 and 10 and added new independent claim 11 and claims 12-21 dependent therefrom. Neither Sampat nor Knowles contains all the elements of the combination now claimed by Applicant in independent claim 11.

For example, claim 11 requires "a sensor for receiving information for controlling the audiovisual reproduction apparatus from a remote control device, at least one operation button of said remote control device corresponding to at least one of said plurality of control buttons."

Sampat does disclose "a preferred embodiment of the remote control window 1300 that is created when the Remote Control item of Options menu 900 is selected." (Col. 7, lines 23-26). But this remote control window has no interaction with a physical remote control. Instead, Sampat teaches "[r]emote control window 1300 is a dialog window that provides functions analogous to those of a standard television remote

control. Remote control window functions include changing channels; changing audio volume; and playing, recording, or rewinding the audio, video, or text components of the current channel.”(Col. 7, lines 26-31). Sampat discloses nothing about a sensor or a remote control device.

Knowles teaches nothing about a remote control device either, so for at least this reason Applicant respectfully submits that the new independent claim 11 is patentably distinguishable from the applied references.

Additionally, the new independent claim 11 requires “a video controller electronic circuit linked to at least one video output connector for connecting to at least a television.”

Sampat, on the other hand, teaches an invention wherein “a user would be able to select a television channel comprising audio and video signals for play on the client computer.” (Col. 1, lines 33-35) (emphasis added). Sampat also teaches “Referring now to FIG. 2 there is shown a preferred embodiment of the user interface 200 that is displayed on the monitor of a client 104...” (Col. 4, lines 64-66) (emphasis added). While a connection to a monitor may be inherently taught by Sampat, Sampat does not teach or disclose providing a connection to a television.

Knowles does teach “[a] decoder is coupled to the first computer system for convening [sic] the digital audio/visual data that has been read from the one or more hard drives to an analog audio/video signal. The analog video signal is supplied to an input of a television monitor...” (Col. 2, lines 2-7). Applicant respectfully submits, however, that

a combination of Knowles and Sampat is improper because Applicant's specification teaches away from Knowles.

Applicant claims, *inter alia*, "A home audiovisual reproduction apparatus comprising: a portable housing..." Furthermore, Applicant's specification makes it clear that Applicant is concerned with developing a small unit usable in the home. When referring to the known audiovisual reproduction devices distinguishable from Applicant's invention, the second paragraph on the first page of Applicant's disclosure states, "these devices are generally bulky including large storage capacities unsuited for home use."

Applicant notes that the notion of a portable housing is supported at least by both the above portions of the specification and by FIGs. 1, and 8-11. The figures show the front faces of various embodiments and one can easily see the compact, portable nature of Applicant's invention.

Knowles is precisely one of the bulky units that Applicant was referring to. Knowles teaches "the audio/video jukebox system 5 according to the present invention is housed in a generally rectangular cabinet 10 having a front [sic] face, a rear face and two opposing side faces. The front and rear faces are slightly wider than the side faces of the cabinet." (Col. 2, lines 62-66) (see also FIG. 1). According to Knowles "The jukebox includes a first computer system... A second computer system is networked with the first computer system and provides a selection means... a decoder is coupled to the first computer system... The analog video signal is supplied to an input of a television monitor... The analog audio signal is supplied... to a karaoke-type audio amplifier that

drives one or more loudspeakers... The audio/video jukebox further comprises a video cassette recorder... A video camera is also provided.” (Col. 1, line 58 – Col. 2, line 17).

Knowles further teaches how all of the components are contained in the cabinet (Col. 3, lines 1-42). Finally, Knowles teaches “The jukebox system further includes a commercial display 16 that comprises either a single backlit poster as shown in FIG. 1 or could comprise a rotating sign board as shown in FIG. 2.” (Col. 4, lines 13-16). All of these components taught by Knowles require the large, bulky cabinet taught by Knowles and this cabinet is hardly portable or designed for home use. Rather, this cabinet tends to resemble the types of devices from which Applicant teaches away.

Applicant respectfully submits that bits and pieces of the Knowles disclosure cannot simply be plucked out and integrated with Sampat, but rather the Knowles disclosure must be considered in its entirety. One of skill in the art, when reading Knowles, would have determined that the large commercial system taught therein was unsuitable for application to a portable, home use unit. Further, even if Sampat and Knowles were combined, the result would be a large, bulky cabinet system capable of playing streaming video, not Applicant’s claimed portable device. This is not to say that Applicant’s system could not be used in places other than a home, but rather that Applicant has invented a small, portable unit whereas Knowles teaches a complex combination of parts in a large housing with a commercial sign affixed thereto.

Therefore, for at least this additional reason, Applicant submits that new claim 11 is patentable over the prior art of record.

NATHAN et al.  
Appl. No. 09/642,928  
December 14, 2006

Claims 12-21 should be patentable at least because of their dependency on allowable claim 11.

Claims 9 and 10 have been cancelled without prejudice. Claims 11-21 have been added and are pending for examination. For at least the reasons presented herein, Applicant submits that new claims 11-21 are patentable over the applied references. Thus, in view of the above, reconsideration and withdrawal of the rejection are respectfully requested.

Respectfully submitted,

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